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May 31, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

Subject: RM Docket No. 10425 -- Reply to Comments of American Cable Association

The Comments of the American Cable Association included strong objection to the suggestion of Lawson Associates that the selection of an EAS broadcast station for pass-through EAS switching be accompanied by negotiation between the cable company and the EAS station. We are persuaded by their argument that this process would add complications and costs that negate the intended economic and operating benefits of the small cable system proposal.

The motivation of the Lawson Associates suggestion was that it is important that the station selected provides EAS bulletins in the traditional format of a full screen EAS slide background without program content or commercial logo. The objective is to insure that one station's program content does not appear on others.

The EAS infrastructure exists to solve this problem in context with the objective to absorb small cable systems with EAS pass-through capabilities into the State and Local Emergency Communications Committee Plans. Technically, many stations already use this EAS format which was the tradition in EBS. EAS exists and matures on the grounds of wide participation of unified groups of Federal, State and local government EAS organizations and media participants. The problem of gaining access to a common EAS bulletin format for pass-through systems is, in our opinion, a matter for the collective and voluntary will in the EAS community, and it is within their reach.

Respectfully submitted,

/s/

Kenneth D. Lawson, President